

# Exhibit B

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

MICHAEL C. MULLER, )  
*individually and on behalf of all others* )  
*similarly situated,* )  
Plaintiffs, )  
v. ) No. 4:21-cv-00583-SEP  
CONOPCO, INC., d/b/a “UNILEVER,” )  
DOES 1 through 10, )  
Defendants. )

**PLAINTIFF’S ANSWERS TO DEFENDANT’S FIRST INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff hereby responds to Defendant Conopco, Inc. d/b/a “Unilever’s” First Set of Interrogatories, as follows:

**INTERROGATORIES**

1. State Your name, current address, date of birth, and social security number.

**ANSWER:**

Michael Charles Muller, DOB 5/21/1980; SS # 499-92-6205

9138 Clydesdale Dr., Crestwood, Missouri 63126

2. State each address where you have resided for the last ten (10) years including the dates you resided at each address.

**ANSWER:**

Plaintiff objects to this Interrogatory as being overbroad and seeking irrelevant information. Subject to that objection, Plaintiff states as follows:

2018 practicing accounting. Before that, Plaintiff worked at Omiga Incorporated in St. Louis, Missouri, from September 2015 to March 2016 practicing accounting. Before that, Plaintiff worked at Buckingham Asset Management in St. Louis, Missouri from 2009 to 2015, also practicing accounting.

5. Identify the date and location where You purchased the Product.

**ANSWER:**

Plaintiff purchased the Product online on November 18, 2020, from Walmart's online marketplace, [www.walmart.com](http://www.walmart.com). Plaintiff's order number was 5942095-312649. The Product was thereafter shipped to Plaintiff and arrived on November 20, 2020.

6. Identify any items of clothing on which You observed white marks after using the Product.

**ANSWER:** Plaintiff answers that after using the Product, he discovered such white marks on virtually all of his clothing shortly after using the Product. Plaintiff mostly noticed the white marks upon removing his clothing, on the insides of his sleeves. But Plaintiff also would sometimes see white marks on the sides of different shirts right after putting them on when wearing the Product. Plaintiff noticed these white marks in various locations on every color of clothing that he wore with the Product. Plaintiff wore long-sleeved dress shirts and/or t-shirts of various colors while using the Product.

7. Identify any items of clothing on which You observed yellow stains after using the Product and how long after your initial use of the Product You first noticed the yellow stains.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

DREW HUSKEY, )  
*individually and on behalf of all others* )  
*similarly situated,* )  
Plaintiffs, )  
v. ) No. 4:21-cv-00710-SEP  
CONOPCO, INC., d/b/a “UNILEVER,” )  
DOES 1 through 10, )  
Defendants. )

**PLAINTIFF’S ANSWERS TO DEFENDANT’S FIRST INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff hereby responds to Defendant Conopco, Inc. d/b/a “Unilever’s” First Set of Interrogatories, as follows:

**INTERROGATORIES**

1. State Your name, current address, date of birth, and social security number.

**ANSWER:**

Richard Andrew (“Drew”) Huskey, DOB December 11, 1980; SS # 495-92-4946

17019 Main St. Grover, Missouri 63040

2. State each address where you have resided for the last ten (10) years including the dates you resided at each address.

**ANSWER:**

Plaintiff objects to this Interrogatory as being overbroad and seeking irrelevant information. Subject to that objection, Plaintiff states as follows:

Plaintiff works for Zander Sporting Goods in St. Louis, Missouri, and has been there since 2020. There, Plaintiff helps conduct online and telephone sales of sporting goods. Before that, Plaintiff worked at Cabellas in Hazelwood, Missouri from 2012 to 2020. There, Plaintiff helped conduct online and telephone sales of sporting goods and firearms. Plaintiff was unemployed in 2011.

5. Identify the date and location where You purchased the Product.

**ANSWER:**

Plaintiff purchased the Product online on January 25, 2021, from Walmart's online marketplace, [www.walmart.com](http://www.walmart.com). Plaintiff's order number was 2972195-898234. The Product was thereafter shipped to Plaintiff and arrived on or around January 29, 2021.

6. Identify any items of clothing on which You observed white marks after using the Product.

**ANSWER:** Plaintiff answers that after using the Product, he discovered such white marks on virtually all of his clothing. He would notice white marks on both the armpit areas and side areas of the shirts. Plaintiff will provide photographs.

7. Identify any items of clothing on which You observed yellow stains after using the Product and how long after your initial use of the Product You first noticed the yellow stains.

**ANSWER:**

Plaintiff noticed white and yellowish staining in the under-arm areas of clothing (mostly shirts) he had worn while using the Product. Plaintiff noticed yellowish staining on certain

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

DREW HUSKEY,	)	
<i>individually and on behalf of all others</i>	)	
<i>similarly situated,</i>	)	
	)	
Plaintiffs,	)	No. 4:21-cv-00781-SEP
	)	
v.	)	
	)	
CONOPCO, INC., d/b/a “UNILEVER,”	)	
DOES 1 through 10,	)	
	)	
Defendants.	)	

**PLAINTIFF’S ANSWERS TO DEFENDANT’S FIRST INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff hereby responds to Defendant Conopco, Inc. d/b/a “Unilever’s” First Set of Interrogatories, as follows:

**INTERROGATORIES**

1. State Your name, current address, date of birth, and social security number.

**ANSWER:**

Richard Andrew (“Drew”) Huskey, DOB: December 11, 1980; SS # 495-92-4946

17019 Main St. Grover, Missouri 63040

2. State each address where you have resided for the last ten (10) years including the dates you resided at each address.

**ANSWER:**

Plaintiff objects to this Interrogatory as being overbroad and seeking irrelevant information. Subject to that objection, Plaintiff states as follows:

Plaintiff lives at 17019 Main St. Grover, Missouri 63040, and has been there since 2018. Before that, Plaintiff lived at 5441 Donovan Ave., St. Louis, Missouri, 63109,

Plaintiff worked at Cabellas in Hazelwood, Missouri from 2012 to 2020. There, Plaintiff helped conduct online and telephone sales of sporting goods and firearms. Plaintiff was unemployed in 2011.

5. Identify the date and location where You purchased the Product.

**ANSWER:**

Plaintiff purchased the Product online on January 25, 2021, from Walmart's online marketplace, [www.walmart.com](http://www.walmart.com). Plaintiff's order number was 2972195-898234. The Product was thereafter shipped to Plaintiff and arrived on or around January 29, 2021.

6. Identify any items of clothing on which You observed white marks after using the Product.

**ANSWER:** Plaintiff answers that, after wearing the shirts and removing them, he noticed a white film in the armpit areas of his clothing. He also noticed white staining on the sides of his shirts, both inside and out. Plaintiff will provide photographs of marked and stained clothing.

7. Identify any items of clothing on which You observed yellow stains after using the Product and how long after your initial use of the Product You first noticed the yellow stains.

**ANSWER:**

Plaintiff noticed yellowish staining on certain shirts about one or two weeks after beginning use of the Product.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

JENNIFER SANDBACH, )  
*individually and on behalf of all others* )  
*similarly situated,* )  
Plaintiffs, ) No. 4:21-cv-00706-SEP  
v. )  
CONOPCO, INC., d/b/a “UNILEVER,” )  
DOES 1 through 10, )  
Defendants. )

**PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff hereby responds to Defendant Conopco, Inc. d/b/a “Unilever’s” First Set of Interrogatories, as follows:

## **INTERROGATORIES**

1. State Your name, current address, date of birth, and social security number.

## ANSWER:

Jennifer Lynn Sandbach, DOB 12/07/1984; SS# 336-78-3493

Current address: 10254 Buffton Dr., St. Louis, Missouri 63128

2. State each address where you have resided for the last ten (10) years including the dates you resided at each address.

**ANSWER:**

Plaintiff objects to this Interrogatory as being overbroad and seeking irrelevant information. Subject to that objection, Plaintiff states as follows:

as a sales associate. Before that, Plaintiff worked at Fazio's Restaurant, RAFCO, and Marty's Bistro, all in St. Louis, Missouri from 2010 to 2018, working as a waitress and a sales associate.

5. Identify the date and location where You purchased the Product.

**ANSWER:**

Plaintiff purchased the Product from Walmart.com on February 1, 2021, order # 3042104-057052. She paid exactly \$4.97 for the product, which was shipped to her and arrived on February 3, 2021.

6. Identify any items of clothing on which You observed white marks after using the Product.

**ANSWER:** Plaintiff answers that she discovered white marks on her dark-colored clothing right after using the Product and after taking off her blouses. Plaintiff noticed that at least some white staining occurred with just about every shirt she wore after applying the Product. Plaintiff will provide photographs of certain damaged shirts.

7. Identify any items of clothing on which You observed yellow stains after using the Product and how long after your initial use of the Product You first noticed the yellow stains.

**ANSWER:**

Plaintiff answers that she noticed white and yellowish markings and staining in the under-arm areas of clothing that she wore while using the Product. Plaintiff noticed yellowish

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

JENNIFER SANDBACH, )  
*individually and on behalf of all others* )  
*similarly situated,* )  
Plaintiffs, )  
v. ) No. 4:21-cv-00709-SEP  
CONOPCO, INC., d/b/a “UNILEVER,” )  
DOES 1 through 10, )  
Defendants. )

**PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff hereby responds to Defendant Conopco, Inc. d/b/a “Unilever’s” First Set of Interrogatories, as follows:

## **INTERROGATORIES**

1. State Your name, current address, date of birth, and social security number.

## ANSWER:

Jennifer Lynn Sandbach, DOB 12/07/1984; SS# 336-78-3493

Current address: 10254 Buffton Dr., St. Louis, Missouri 63128

2. State each address where you have resided for the last ten (10) years including the dates you resided at each address.

**ANSWER:**

Plaintiff objects to this Interrogatory as being overbroad and seeking irrelevant information. Subject to that objection, Plaintiff states as follows:

as a sales associate. Before that, Plaintiff worked at Fazio's Restaurant, RAFCO, and Marty's Bistro, all in St. Louis, Missouri from 2010 to 2018, working as a waitress and a sales associate.

5. Identify the date and location where You purchased the Product.

**ANSWER:**

Plaintiff purchased the Product from Walmart.com on February 1, 2021, order # 3042104-057052. She paid exactly \$4.72 for the product, which was shipped to her and arrived on February 3, 2021.

6. Identify any items of clothing on which You observed white marks after using the Product.

**ANSWER:** Plaintiff answers that she discovered white marks on multiple articles of clothing that she wore after applying the Product. Plaintiff noticed the staining after removing the shirt or blouse she wore with the Product and sometimes right after putting her clothing on. Plaintiff will provide photographs of certain damaged shirts.

7. Identify any items of clothing on which You observed yellow stains after using the Product and how long after your initial use of the Product You first noticed the yellow stains.

**ANSWER:**

Plaintiff answers that she noticed yellowish markings and staining in the under-arm areas of clothing that she wore while using the Product. Plaintiff noticed yellowish staining on

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

PETER FISCHER, )  
*individually and on behalf of all others* )  
*similarly situated,* )  
                        )  
Plaintiffs,              )     No. 4:21-cv-00782-SEP  
                        )  
v.                        )  
                        )  
CONOPCO, INC., d/b/a “UNILEVER,” )  
DOES 1 through 10,        )  
                        )  
Defendants.             )

**PLAINTIFF’S ANSWERS TO DEFENDANT’S FIRST INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff hereby responds to Defendant Conopco, Inc. d/b/a “Unilever’s” First Set of Interrogatories, as follows:

**INTERROGATORIES**

1.     State Your name, current address, date of birth, and social security number.

**ANSWER:**

Peter William Fischer, DOB April 4, 1988; SS# 490-98-9713

Current address: 3060 Highland Villas Ct., Arnold, Missouri 63010.

2.     State the name and date of birth of Your spouse(s) and children, if any.

**ANSWER:**

Plaintiff objects to this Interrogatory as being overbroad and seeking irrelevant information. Subject thereto, Plaintiff is unmarried.

**ANSWER:**

Plaintiff objects to this Interrogatory as being overbroad and seeking irrelevant information.

Subject to that objection, Plaintiff states as follows:

Plaintiff currently works for an individual named Walter Calvera, who is a general contractor.

Plaintiff has been with him since 2014. There, Plaintiff does bricklaying and masonry work.

Before that, Plaintiff worked at multiple different restaurants and health clubs, including

Bally's and Rich & Charlie's.

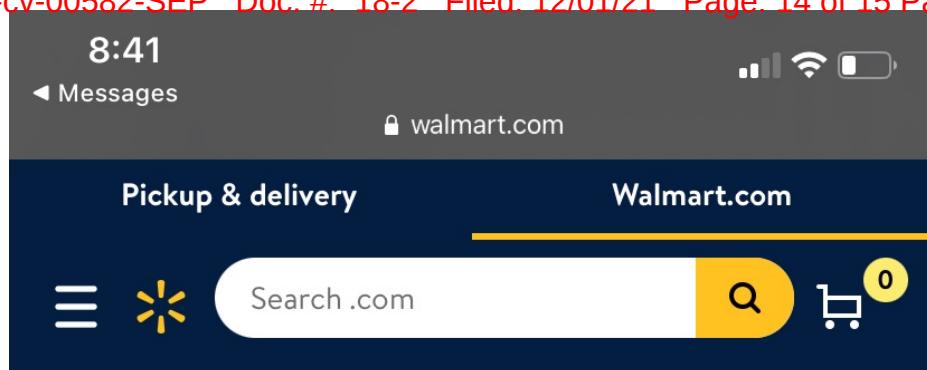
6. If You have ever been arrested, charged with, or convicted of any felony or misdemeanor, state the date, jurisdiction, nature, and disposition of each such arrest, charge, or conviction.

**ANSWER:** Plaintiff objects to this Interrogatory as being overbroad and seeking irrelevant information. Subject thereto, Plaintiff states that he has never been convicted of any crime.

7. For the Product You purchased, identify the date of purchase, the location where You purchased the Product, the specific variety of the Product purchased, the price of the Product, and the method of payment used.

**ANSWER:**

Plaintiff purchased the Product from Walmart online on January 25, 2021, using his personal credit/debit card. The order was #2962195444136 and the Product was shipped to him on January 28, 2021. Plaintiff paid \$9.19 for a two-pack of the Product.



Brandi Goulart  
brandigoulart123@gmail.com  
(314) 359-8467

Available Tomorrow



[See your item details](#) +

Check your [order status](#) on Walmart.com

### Order Summary

Subtotal (1 item)	\$5.94
Pickup	Free
Tax	\$0.47
Total	<b>\$6.41</b>

### Payment type

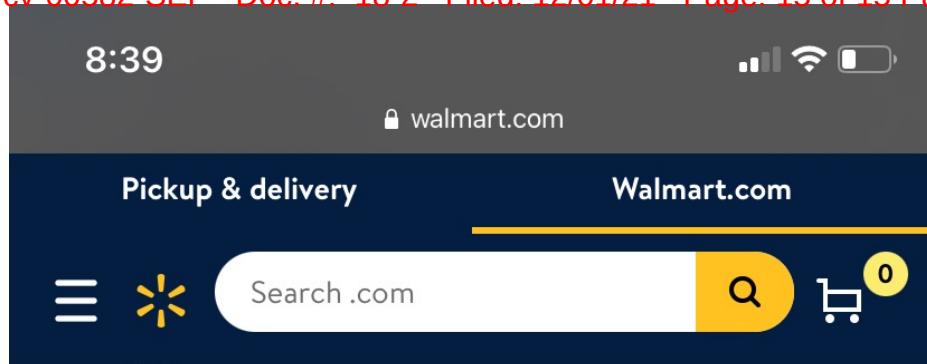
Visa ending in 1024

Feedback

### Billing address

Brandi Goulart  
1412 Tisbury circle  
O Fallon, MO 63366  
brandigoulart123@gmail.com

GOULART I (0888) - PRODUCTION 001



Check your [order status](#) on Walmart.com

## Order Summary

Subtotal (1 item)	\$4.88
Pickup	Free
Tax	\$0.39
<b>Total</b>	<b>\$5.27</b>

## Payment type

Visa ending in 1024

Feedback 

## Billing address

Brandi Goulart

1412 Tisbury circle

GOULART II (0892) - PRODUCTION 001

O Fallon, MO 63366